

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

v.

20-CR-98-LJV-MJR

PRISCILLA VOGELBACHER,

Defendant.

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**SECOND BILL OF PARTICULARS**

**THE UNITED STATES**, by and through its attorney, James P. Kennedy, Jr., United States Attorney for the Western District of New York, and Douglas A. C. Penrose and Aaron J. Mango, Assistant United States Attorneys, of counsel, hereby files a second bill of particulars specifying the Chapter 109A offense that constitutes illicit sexual conduct in relation to Count 2 and 3 of the Indictment.

Counts 2 and 3 of the Indictment charge the defendant with interstate travel to engage in illicit sexual conduct, in violation of Title 18, United States Code, Section 2423(b). “Illicit sexual conduct” is defined as “a sexual act . . . with a person under 18 years of age that would be in violation of chapter 109A if the sexual act occurred in the special maritime and territorial jurisdiction of the United States.” 18 U.S.C. § 2423(f). For purposes of Counts 2 and 3 of the Indictment, the government will prove that the defendant’s conduct, had it occurred in the special maritime or territorial jurisdiction of the United States, would have constituted a

violation of Title 18, United States Code, Section 2243(a), sexual abuse of a minor, a Chapter 109A offense.

DATED: Buffalo, New York, October 1, 2021.

JAMES P. KENNEDY, JR.  
United States Attorney

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